

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**GLORIA PUMPHREY and ANGALYN  
JONES, for themselves and on behalf of all  
similarly situated individuals,**

**Plaintiffs,**

**v.**

**EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

**Defendant.**

**Civil Action No.: 3:11-CV-574**

**JOINT MOTION TO ENTER STIPULATED PROTECTIVE ORDER**

Plaintiffs Gloria Pumphrey and Angalyn Jones and Defendant Experian Information Solutions, Inc. ("Experian"), through their respective attorneys of record, respectfully request that the Court enter the accompanying Stipulated Protective Order (attached as Exhibit 1) to facilitate document disclosure and production in this matter and to protect the parties' confidential proprietary and/or business information.

Dated: February 29, 2012

/s/ Leonard A. Bennett

Leonard A. Bennett, Esq.  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
12515 Warwick Boulevard, Suite 100  
Newport News, Virginia 23606  
Tel: (757) 930-3660  
Fax: (757) 930-3662  
Email: lenbennett@clalegal.com  
*Attorney for Plaintiffs*

Matthew J. Erausquin  
CONSUMER LITIGATION  
ASSOCIATES, P.C.  
1800 Diagonal Road, Suite 600  
Alexandria, VA 22314  
Tel: (703) 273-7700  
Fax: (888) 892-3512  
Email: matt@clalegal.com  
*Attorney for Plaintiffs*

Dale W. Pittman  
The Law Office of Dale W. Pittman, P.C.  
The Eliza Spotswood House  
112-A West Tabb Street  
Petersburg, Virginia 23803  
Tel: (804) 861-6000  
Fax: (804) 861-3368  
Email: dale@pittmanlawoffice.com  
*Attorney for Plaintiffs*

/s/ Joseph W. Clark

Joseph W. Clark  
  
Daniel J. McLoon (pro hac vice)  
JONES DAY  
555 South Flower Street, Fiftieth Floor  
Los Angeles, CA 90071  
Telephone: (213) 243 – 2580  
Fax: (213) 243 – 2539  
E-mail: djmcloon@jonesday.com  
*Attorney for Defendant*

Joseph W. Clark  
Virginia State Bar No. 42664  
JONES DAY  
51 Louisiana Avenue, NW  
Washington, DC 20001-2113  
Telephone: (202) 879 – 3697  
Fax: (202) 626 – 1700  
E-mail: jwclark@jonesday.com  
*Attorney for Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on this 29th day of February, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will then send a notification of such filing to the following:

Matthew J. Eraisquin  
Consumer Litigation Associates, P.C.  
1800 Diagonal Road, Suite 600  
Alexandria, VA 22314  
Tel: (703) 273-7700  
Fax: (888) 892-3512  
Email: [matt@clalegal.com](mailto:matt@clalegal.com)

Leonard A. Bennett  
Consumer Litigation Associations, P.C.  
12515 Warwick Boulevard, Suite 100  
Newport News, VA 23606  
Tel: (757) 930-3660  
Fax: (757) 930-3662  
Email: [lenbennett@clalegal.com](mailto:lenbennett@clalegal.com)

Dale W. Pittman  
The Law Office of Dale W. Pittman, P.C.  
The Eliza Spotswood House  
112-A West Tabb Street  
Petersburg, Virginia 23803  
Tel: (804) 861-6000  
Fax: (804) 861-3368  
Email: [dale@pittmanlawoffice.com](mailto:dale@pittmanlawoffice.com)

*Counsel for Plaintiffs*  
*Gloria Pumphrey and Angalyn Jones*

/s/ Joseph W. Clark \_\_\_\_\_  
Joseph W. Clark, Esq.

*Attorney for Defendant*  
*Experian Information Solutions, Inc.*